

Bradford J. Sandler, Esq. (NY Bar No. 4499877)
Ilan D. Scharf, Esq. (NY Bar No. 4042107)
Jason S. Pomerantz, Esq. (CA Bar No. 157216)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777

Counsel to Plaintiff RDC Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Advisory Trust Group, LLC, as trustee of the RDC
LIQUIDATING TRUST,

Plaintiff,

v.

GENSCO LABORATORIES, LLC,

Defendant.

Chapter 11

Case No. 20-20230 (PRW)

Adv. Proc. No. 22-02029 (PRW)

SECOND STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff”)
or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc., and
defendant, Gensco Laboratories, LLC (“Defendant”, and together with Plaintiff, the “Parties”), by
and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against
Defendant;

WHEREAS, the summons (the "Summons") was issued on February 4, 2022;
WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;
and

WHEREAS, on March 2, 2022, the Parties entered into a stipulation (the "First Stipulation")
by which the time required for Defendant to answer the Complaint was extended through and
including April 15, 2022. The First Stipulation was approved by order entered March 4, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject to Court approval, to further extend the time for the Defendant to answer the Complaint to and including May 13, 2022.
2. All other terms set forth in the First Stipulation remain in full force and effect.

Respectfully submitted,

Dated: April 14, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

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Jason S. Pomerantz (CA Bar No. 157216)
780 Third Avenue, 34th Floor
New York, NY 10017
Telephone: (212) 561-7700
Email: bsandler@pszjlaw.com
ischarf@pszjlaw.com
jspomerantz@pszjlaw.com

Counsel to Plaintiff RDC Liquidating Trust

SO ORDERED:

DATED: _____, 2022
Rochester, New York

Dated: April 14, 2022

LIPPES MATHIAS

Joann Sternheimer

Joann Sternheimer (NY Bar No. 2713501)
54 State Street, Suite 1001
Albany, NY 12207-2527
Telephone: (518) 462-0110, Ext. 1440
Email: jstemheimer@lippes.com

Counsel to Defendant Gensco Laboratories, LLC

HON. PAUL R. WARREN